Global Supply Chain Transparency Report

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Introduction

This Global Supply Chain Transparency Report ("Report") is published by Axalta Coating Systems, LLC ("Axalta") on behalf of Axalta itself, its subsidiaries, and its affiliates worldwide including those conducting business in the United States, Canada, the United Kingdom, France, Norway, and Australia. The Report is designed to conform with the reporting requirements of a multitude of global supply chain transparency laws including but not limited to: the California Transparency in Supply Chain Act; the Australian Commonwealth's Modern Slavery Act; the United Kingdom's Modern Slavery Law; the Norwegian Transparency Act; and, the French Corporate Duty of Vigilance Law. The Report discusses: Axalta's operations; its supply chain; Axalta's policies related to forced labor, child labor, and human trafficking; and, due diligence processes, employee training, and corrective action processes to prevent, detect, and remediate human rights violations.

Axalta is committed to conducting human rights due diligence in line with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. This includes identifying, assessing, preventing, mitigating, and addressing actual and potential adverse human rights impacts linked to Axalta's operations and supply chain.

Axalta's Structure, Operations, and Supply Chain

Axalta is a leading global coatings company dedicated to the development, manufacture and sale of liquid and powder coatings. Our durable products protect, enhance productivity and add beauty to the materials they coat. With more than 150 years of experience creating innovative industrial coatings, Axalta's products are used for a wide array of surfaces and applications around the world. We are constantly innovating our products and services to better serve more than 100,000 customers in 130 countries.

Axalta's products and services are used in a wide variety of applications around the world. We provide a range of performance and transportation coatings for manufacturers of light and commercial vehicles, the refinish aftermarket and for many industrial coating system applications. Our customers range from family-owned collision repair shops to globally recognized car manufacturers and producers of electric motors and wood cabinetry. We are committed to providing our customers with high-quality and innovative products and services that include paint and powder coatings and, to optimize their use of our products, color matching tools, application technologies and training and business management systems.

Axalta consists of two business segments: Performance Coatings and Mobility Coatings. The Performance segment sells products into both the vehicle refinish end market and the industrial end market (including general industrial, architectural, transportation, and building product coatings). The Mobility segment sells products into the light and commercial vehicle coating original equipment manufacturer end market. Axalta has approximately 45 manufacturing

facilities (including 3 joint venture sites) worldwide, and sources from approximately 14,000 suppliers in 35 countries globally.

Policies

Axalta's Supplier Code of Conduct ("Code") was first adopted in 2016 and was most recently revised in September of 2024 to ensure compliance with global supply chain transparency laws. All Axalta suppliers are required to be familiar with the Code, and are similarly required to take appropriate steps to ensure compliance with the Code. The Code generally requires Axalta's suppliers to act in compliance with all applicable laws, do business ethically, and provide a workplace free from discrimination and harassment. More specifically, the Code prohibits suppliers from using child labor, forced labor, engaging in human trafficking or any form of modern slavery, requires suppliers to pay reasonable renumeration, wages, and benefits, and requires suppliers to provide a safe work environment. The Code lists approximately 50 "High Risk Countries" where the risks of supplier use of forced labor and/or child labor is believed by Axalta to be greater than the risk present in the rest of the world generally. Pursuant to the Code, suppliers in High Risk Countries may be subjected to additional screening including enhanced self-assessment questionnaires, targeted "Know Your Supplier" visits by Axalta personnel, and/or third-party audits of one or more supplier locations within High Risk Countries.

Axalta's standard supplier contract requires suppliers to warrant their compliance with, *inter alia*, applicable laws including minimum age, wage, and hour standards. Historically, all Axalta suppliers have gone through an onboarding process that includes an initial supplier assessment. Suppliers are subsequently further assessed for numerous risks. and screened on the expectations in the Code.

Suppliers that provide us raw materials that contain certain minerals that may present higher risk of modern slavery, including cobalt, mica, and 3TG minerals - tin, tungsten, tantalum, and gold, are required to trace their supply chains, provide mineral reporting templates annually, and demonstrate the minerals in the materials provided to us were sourced free of human rights abuses. Axalta also actively supports and participates in the Responsible Minerals Initiative, which works to advance responsible sourcing practices and eradicate modern slavery in mineral supply chains. For more information please review our Responsible Minerals Policy.

Axalta's Human Rights Policy is aligned with the principles of the United Nations Global Compact and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. This policy requires all Axalta personnel, all current and prospective suppliers, and all other business partners and relevant parties to adhere to the values expressed in the Policy, including but not limited to, prohibitions against child/underage labor, human trafficking, forced/prison labor, inhumane disciplinary practices, and unreasonable wages/working hours. For more information please review our Human Rights Policy.

Suppliers are required to comply with applicable environmental laws and regulations. Suppliers must also comply with all required environmental permits. Suppliers are expected to support Axalta's efforts to operate sustainably by developing, implementing, and maintaining environmental best practices to reduce and minimize air emissions, greenhouse gas emissions, wastewater discharges, waste generation, biodiversity loss, and ensure operations do not adversely impact the communities where they operate.

Axalta's suppliers are required to comply with all applicable occupational safety and health laws and regulations while ensuring that employees are provided with a safe and healthy workplace. Axalta's suppliers' employees are expected to have the right to refuse to work in unsafe conditions and/or to report unsafe or unhealthy working conditions without fear of retribution. Suppliers are expected to provide employees with accessible and clean restroom facilities, clean potable water, and adequate living standards for employees housed in onsite dormitories or other employer-provided housing.

Active suppliers are subject to continuous assessment and are expected to communicate Axalta's requirements to their own suppliers and subcontractors and take reasonable steps to ensure alignment with the principles set out in our Supplier Code of Conduct.

Due Diligence Processes

Axalta's standard supplier contract and its Supplier Code of Conduct both reserve Axalta's right to conduct on-site audits of its suppliers. These audits may evaluate the compliance with laws and the expectations in the Code, including eradication of human trafficking and slavery. Axalta may conduct such audits through its own personnel (or through a third-party independent auditor) on either an announced or unannounced basis. Axalta may also screen both prospective and current suppliers on the expectations outlined in the Code.
Where non-compliance is identified, Axalta seeks to work with suppliers to implement appropriate corrective action plans within defined timeframes. Where remediation is not possible or where severe violations persist, Axalta may suspend or terminate the business relationship.

Axalta recognizes that certain human rights risks—such as forced labor, child labor, human trafficking, excessive working hours, and unsafe working conditions—may be more prevalent in specific geographies, commodities, or tiers of the supply chain. Axalta uses a risk-based approach to prioritize due diligence efforts where the risk of adverse impacts is higher. Axalta has adopted a list of approximately 50 "High Risk Countries" where the risks of supplier human rights violations is believed by Axalta to be greater than the risk present in the rest of the world generally. Pursuant to Axalta's Code, suppliers in High Risk Countries may be subjected to additional screening including enhanced self-assessment questionnaires, targeted "Know Your Supplier" visits by Axalta personnel, and/or third-party audits of one or more supplier locations within High Risk Countries.

Axalta maintains reporting and whistleblower mechanisms that allow employees and third parties, including suppliers and their workers, to raise concerns related to human rights, ethics, or legal compliance in good faith and without fear of retaliation. Reported concerns are reviewed and addressed in accordance with Axalta's established investigation and remediation procedures. These mechanisms are described further in Axalta's Code of Business Conduct and Ethics.

During the reporting period, Axalta identified and assessed a supply chain risk associated with possible supplier use of forced labor. Axalta temporarily discontinued sourcing from this supplier while a thorough investigation was conducted. In the course of the investigation, the supplier in question provided information sufficient to reasonably conclude there was, in fact, no forced labor. Ultimately, Axalta determined that the matter had been appropriately resolved and sourcing was restarted. Axalta continues to enhance its risk-based due diligence processes and supplier oversight practices.

Key Performance Indicators and Continuous Improvement

Key performance indicators of the effectiveness of Axalta's human rights related efforts include:

- The number of suppliers assessed annually, on-site audits, "Know Your Supplier" visits, and other means;
- The number of potential Supplier Code of Conduct compliance issues identified annually through any means; and
- Verification of timely implementation of appropriate corrective actions.

Each of these key performance indicators will be assessed annually to identify opportunities to improve Axalta's policies and/or due diligence processes. Signs that changes or improvements might be warranted may include the presence or absence of identified compliance issues and metrics related to corrective action implementation.

Employee Training

On an annual basis, all Axalta employees must complete training on the Axalta Code of Business Conduct and Ethics. Axalta's Legal and Compliance team also conducts targeted training sessions on a variety of compliance topics, including those relating to human rights. Training content is reviewed periodically and updated as appropriate to reflect evolving regulatory requirements, emerging human rights risks, and lessons learned from Axalta's due diligence activities.

Axalta currently provides focused training to our global procurement staff that work directly with our supply chain partners. This training focuses on the identification of supply chain and ESG risks. As part of its Supplier Code of Conduct, Axalta has developed and will implement enhanced "Know Your Supplier" training to ensure that Axalta personnel (including but not limited to selected supply chain and sourcing personnel) are aware of each of the risk areas covered by the Code. Axalta's "Know Your Supplier" training instructs personnel of the various warning signs of human rights abuses, forced labor, child labor, human trafficking, environmental non-compliance and unsafe workplaces which may be observed during visits to supplier facilities. Axalta personnel will also be trained in proper reporting and escalation procedures so that any warning signs that may be observed can be thoroughly investigated and promptly remedied as appropriate.

Remediation Efforts and Results

No violations of the Supplier Code of Conduct warranting remediation were identified during the current reporting period.

Axalta's Internal Governance and Consultation Processes

The above-listed policies and procedures are applicable to Axalta itself, its subsidiaries, and its affiliates worldwide. Administration of these policies and procedures is conducted through the

close collaboration of internal Axalta functions including but not limited to supply chain, sourcing, commercial, legal and compliance, and human resources. Oversight of human rights-related risks and supply chain transparency is integrated into Axalta's governance framework, with material global supply chain transparency compliance matters escalated to Axalta's senior leadership and, as necessary, its Board of Directors (including the boards of directors of relevant subsidiaries).

Conclusion

Axalta is committed to respecting and upholding the highest standards of social responsibility and ethical business practices. We believe in conducting our business everywhere with respect for human rights and in accordance with internationally recognized human rights principles, and in a way that is fair, safe, and respectful of all people.